

3M Experience With PALs

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1st Flexible PAL Permit for 3M

- 3M Tape Manufacturing Division Plant
St. Paul, MN
- 2 year process
- 1st Flexible/PAL permit in the country
- 1st Title V permit in the country

Critical Reasons (at the time)

- Grandfathered sources
- Installation of voluntary control system
- Significant emission reductions available
- Went thru PSD review “up front”

Flexible Permit Concept

- Emissions cap over entire facility
- Mandatory operation of pollution control equipment
- Increased emissions monitoring and record keeping
- Flexible construction and installation requirements

Benefits of the Flexible/PAL Permit

- Permitted the entire facility sooner
- No permitting delays for modifications
- Requires operation of control systems
- Caps emissions
- Eliminated PSD concerns
- Provide for detailed emissions tracking
- Potential for multi-plant use
- Reduced resource demands
- Provided for easy enforcement

Disadvantages of Flexible/PAL Permit

- Caps facilities emissions and give the perception that the facility can't grow
- Resources for “up front” permitting/PSD review
- Additional record keeping and reporting